

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WINSTAR HOLDINGS, LLC and  
IDT CORP.,

Plaintiff,

Civ. No.: 07 CV 4634 (GEL)(AJP)  
ECF Case

-against-

THE BLACKSTONE GROUP LP; IMPALA  
PARTNERS, LLC; AND CITICORP

Defendants.

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**DECLARATION OF MELISSA A. ROOVER, ESQ.**

Melissa A. Roover, Esq., pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. I am an attorney with the law firm of Grayson & Kubli, P.C., attorneys for Winstar Holdings, LLC and IDT Corp. ("Plaintiffs"), Plaintiffs in the above-mentioned action. I am fully familiar with all of the matters set forth in this declaration. I submit this declaration in opposition to Defendants' Motion to Transfer Venue to the United States District Court for the District of Delaware.

2. All of the parties to this case are located in the New York metropolitan area. As alleged in the Complaint, Defendant Blackstone Group's principal office is located at 345 Park Avenue, New York, New York 10154; Defendant Citigroup, Inc.'s principal office is located at 399 Park Avenue, New York, New York, 10043 and Defendant Impala Partners' principal office is located at 18 Marshall Street, Norwalk, CT 06854 (approximately 48 miles from the

Courthouse). Plaintiffs Winstar Holdings, LLC and IDT Corp. are located at 520 Broad Street, Newark, NJ 07102.

3. Several key witnesses expected to testify in this case are also located in the New York Metropolitan area. These witnesses include, but are not limited to: (1) Arthur Newman, 345 Park Avenue, New York, NY 10154; (2) Paul A. Street, 18 Marshall Street, Norwalk, CT 06854; (3) non-party David Duncan, 500 West 37<sup>th</sup> Street, New York, NY 10001 (as reflected on his current employer's website (<http://www.denihan.com>)); (4) Howard Jonas, 520 Broad Street, Newark, NJ 07102; (5) Motti Lichtenstein, 520 Broad Street, Newark, NJ 07102; and (6) Norman Rosenberg, 520 Broad Street, Newark, NJ 07102.

4. Attached hereto as Exhibit A is a true and correct copy of the June 11, 2002 Order entered by the Bankruptcy Court for the District of Delaware.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 19, 2001  
McLean, Virginia 22102

s/ Melissa A. Hoover  
Melissa A. Hoover

